

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ROBERT BESEDIN, SR.,

**DOCKET NO.: CV-18-819  
(NRM)(ST)**

Plaintiff,

-against-

COUNTY OF NASSAU, NASSAU COUNTY POLICE  
DEPARTMENT, POLICE OFFICER STEPHEN  
BECKWITH and POLICE OFFICER JOHN  
MANTOVANI in their individual and official capacities,

Defendants.  
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**DECLARATION OF FREDERICK K. BREWINGTON  
IN SUPPORT OF PLAINTIFF'S MEMORANDUM OF LAW  
IN OPPOSITION TO DEFENDANTS'  
MOTION IN LIMINE**

I, **FREDERICK K. BREWINGTON**, declare under the pains and penalties of perjury pursuant to 28 U.S.C. §1746, that the following statements are true and correct, to the best of my knowledge:

1. I am one of the attorneys representing Plaintiff, ROBERT BESEDIN, SR. I SUBMIT THIS Declaration in support of Plaintiff's Memorandum of Law and Supporting Papers in Opposition to Defendants COUNTY OF NASSAU, NASSAU COUNTY POLICE DEPARTMENT, POLICE OFFICER STEPHEN BECKWITH and POLICE OFFICER JOHN MANTOVANI in their individual and official capacities, (collectively "Defendants") Motion *IN LIMINE*.

2. Attached as Exhibit A is a true and accurate copy of Plaintiff's 50-H Transcript.

3. Attached as Exhibit B is a true and accurate copy of Dr. Berrill's Expert Report.

4. Attached as Exhibit C is a true and accurate copy of Dr. Berrill's Deposition transcript dated April 23, 2023.

5. Attached as Exhibit D is a true and accurate copy of Robert Besedin Jr.'s Deposition transcript dated June 8, 2022.

6. Attached as Exhibit E is a true and accurate copy of Plaintiff's Initial Disclosures dated April 10, 2019.

7. Attached as Exhibit F is a true and accurate copy of Lloyd Nadel Esq.'s representation statement dated October 15, 2021.

8. Attached as Exhibit G is a true and accurate copy of Robert Besedin Sr.'s Examination Before Trial dated March 31, 2023.

9. Attached as Exhibit H is a true and accurate copy of Judith Besedin's Deposition via zoom teleconference dated November 2, 2022.

10. Attached as Exhibit I is a true and accurate copy of Defendant Dominick Mantovani s/h/a John Mantovani's Deposition via zoom video dated June 3, 2022.

Dated: Hempstead, New York  
September 30, 2024

Respectfully submitted,

LAW OFFICES OF  
FREDERICK K. BREWINGTON

By: *Frederick K. Brewington*  
FREDERICK K. BREWINGTON  
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